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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., and
PATRICIA CAULEY, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendant.

Civil Action No. 17-01775 (MCA) (JSA)

Hon. Madeline Cox Arleo, U.S.D.J.

Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF JAVIER
BLEICHMAR, ESQ. IN SUPPORT OF
APPLICATION FOR ADMISSION *PRO
HAC VICE***

I, Javier Bleichmar, of full age, make this application to appear as counsel *pro hac vice* in the above-captioned action, hereby declare:

1. I am a Partner in the law firm of Bleichmar Fonti & Auld LLP, 7 Times Square, 27th Floor, New York, New York 10036. I am fully familiar with the facts and circumstances surrounding this litigation.

2. I submit this declaration to the Court in support of the application for my admission *pro hac vice* in this matter pursuant to Local Civil Rule 101.1(c), and I am personally familiar with the facts set forth in this Declaration.

3. My law firm has been retained as counsel for Plaintiffs Thomas Roger White, Jr. and Patricia Cauley (“Plaintiffs”) in the above-referenced matter. The issues raised in this litigation involve areas with which I have experience in the law.

4. I am ineligible for plenary admission to the bar of this Court pursuant to Local Civil Rule 101.1(b).

5. I am willing to submit to the jurisdiction of this Court and to comply with all of its rules and procedures. To ensure my familiarity with these regulations I have reviewed the Local Rules of this Court.

6. Attached hereto as **Exhibit A** is a true and correct chart that identifies, to the best of my knowledge, my bar admissions, the year in which I was admitted to each bar, and, for each bar, the name and address of the official or office maintaining the roll of its members.

7. I am not under suspension or disbarment by any court and have never been subjected to any disciplinary action by any court or governing body.

8. I have never been convicted of a felony crime, censured, suspended, disciplined, or disbarred by any court, nor are there any disciplinary or contempt proceedings involving me

pending before any court, nor have I been denied admission to any court during the last five years.

9. I agree to abide by the ethical standards governing the practice of law in this Court pursuant to the New Jersey State Lawyer's Rules of Professional Conduct.

10. I agree to abide by Local Civil Rule 101.1(c).

11. Pursuant to the Local Rules of this Court, Mack Press, Esq., a member in good standing of the bars for the State of New Jersey and the United States District Court for the District of New Jersey, will review and sign all pleadings, briefs, and other papers filed with the Court on behalf of Plaintiffs, and will be present for all appearances before the Court unless previously excused from appearing by the Court.

12. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial, or other proceedings, to submit to the jurisdiction of this Court for the purposes of sanctions, discipline, or other such action as the Court may deem proper, and to otherwise abide by all the terms and conditions of Local Civil Rule 101.1(c). I agree to be bound by the rules governing practice in the New Jersey Courts, including the disciplinary rules.

13. Pursuant to Local Civil Rule 101.1(c)(2), I agree to pay, or cause to be paid, the annual fee required by the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) and as directed by the Trustees of the Fund.

14. Pursuant to Local Civil Rule 101.1(c)(3), I shall pay, or cause to be paid, \$150.00 to the Clerk of the United States District Court for the District of New Jersey.

15. In light of the foregoing, I respectfully request on behalf of Plaintiffs that I be admitted *pro hac vice* for the purpose of representing them in this matter in association with The Mack Firm.

* * *

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2023 in New York, New York.

By: *s/ Javier Bleichmar*
Javier Bleichmar, Esq.

Exhibit A

I, Javier Bleichmar, state that I am currently admitted to practice in the following state jurisdictions:

| State | Attorney State Identification Number | Year of Admission |
|--------------|---|--------------------------|
| New York | 2958916 | 1999 |

I have been admitted to and am a member of good standing of the following federal courts, and the name and address of the official or office maintaining the roll of its members are as follows:

| | Year of Admission |
|--|--------------------------|
| U.S. Supreme Court One First Street, NE, Washington, DC 20543 | 2014 |
| U.S. Court of Appeals for the Second Circuit Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007 | 2010 |
| U.S. Court of Appeals for the Third Circuit 21400 U.S. Courthouse 601 Market Street, 21st Floor, Philadelphia, PA 19106 | 2021 |
| U.S. Court of Appeals for the Fourth Circuit Lewis F. Powell Jr. Courthouse & Annex 1100 East Main Street, Suite 501, Richmond, VA 23219 | 2012 |
| U.S. Court of Appeals for the Eighth Circuit Thomas F. Eagleton Courthouse 111 South Tenth Street, Suite 24.329, St. Louis, MO 63102 | 2010 |
| U.S. Court of Appeals for the Ninth Circuit James R. Browning Courthouse 95 7th St, San Francisco, CA 94103 | 2010 |
| U.S. Court of Appeals for the Tenth Circuit Byron White Courthouse 1823 Stout Street, Denver, CO 80257 | 2013 |
| U.S. Court of Appeals for the Eleventh Circuit Elbert P. Tuttle Courthouse 56 Forsyth St., N.W., Atlanta, Georgia 30303 | 2011 |
| U.S.D.C., Southern District of New York Daniel Patrick Moynihan Courthouse 500 Pearl Street, New York, NY 10007 | 1999 |
| U.S.D.C., Eastern District of New York Brooklyn Courthouse 225 Cadman Plaza East, Brooklyn, NY 11201 | 1999 |
| U.S.D.C., District of Colorado Alfred A. Arraj Courthouse 901 19th Street, Room A105, Denver, CO 80294 | 2020 |